

UNITED STATES OF AMERICA, )  
 )  
v. ) Case Number: 7:16CR00010  
 )  
CHASITY ANNE BAILEY, )  
 )  
Defendant. )

Comes now the defendant, Chasity Anne Bailey, and moves the Court to enter an Order pursuant to Brady v. Maryland, 373 U.S. 83 (1963) and its progeny directing the United States attorney to provide her with the following:

(A) All information of whatever form, source or nature which tends to exculpate the defendant, either through indication of her innocence or the potential impeachment of any government witness.

Case 7:16-cr-00010-MFU Document 58 Filed 03/24/16 Page 1 of 3 Pageid#: 142

(C) Any and all records and information revealing prior misconduct or bad acts attributed to each government witness to be called by the government at sentencing or any supervised release violation proceedings;

(D) Any and all consideration or promise of consideration given to or on behalf of each government witness. By “consideration,” the defendant refers to anything of value or use, including but not limited to criminal, civil or tax immunity grants; assistance or favorable treatment or recommendations with respect to any criminal, civil, tax court, court of claims, administrative or other legal dispute with the government (state or federal), or any other parties; payments of money or fees, such as witness fees and special witness fees, provision of food, clothing, shelter, transportation or other like benefits; placement in a “witness protection program;” and any other matter, without limitation, which could reveal an interest or bias of the witness in favor of the government or against the defense, or act as an inducement to testify, to color testimony, or to refuse to discuss testimony or facts with defense counsel;

(E) Information regarding any and all criminal prosecutions, investigations and potential prosecutions pending or which could be brought against each government witness; any probationary, parole, and deferred prosecution status of each government witness; and any civil, tax court, court of claims, administrative, and other pending or potential legal disputes and/or transactions each government witness may have with the government (state or federal); and

(F) Any and all other records and information which might assist the defense in impeaching a government witness, or which otherwise detracts from the probative force of the government’s evidence, leads to discovery of such records or information, or which is material either to guilt or punishment of this defendant.

CHASITY ANNE BAILEY

By: /s/Paul G. Beers  
Of Counsel

Paul G. Beers (VSB # 26725)  
Glenn, Feldmann, Darby & Goodlatte  
37 Campbell Avenue, S.W.  
P. O. Box 2887  
Roanoke, Virginia 24001-2887  
Telephone (540) 224-8035  
Facsimile (540) 224-8050  
Email: [pbeers@glennfeldmann.com](mailto:pbeers@glennfeldmann.com)

Counsel for Chasity Anne Bailey

Certificate of Service

I hereby certify that on March 24, 2016, I electronically filed the foregoing Defendant Chasity Anne Bailey's Motion for Exculpatory Information with the Clerk of the Court using the CM/ECF system which will send notification of such filing to R. Andrew Bassford, Esq., Assistant United States Attorney, United States Attorney's Office, P.O. Box 1709, Roanoke, Virginia 24008-1709.

/s/Paul G. Beers  
Paul G. Beers